



North American Health, Safety and Environmental Services

May 4th, 2007

Document Processing Desk – 6(a)(2)
Office of Pesticide Programs
Room 266A
Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: FIFRA 6(a)(2) report - Phosphonium, tetrakis(hydroxymethyl)-, sulfate (2:1) (salt), CAS# 55566-30-8

Dear Sir or Madam:

In accordance with the provisions of 40 CFR 159.152, Rhodia Inc. respectfully submits the following information on the above-referenced chemical. This information was previously provided to the agency on the April 5th, 2007 and is now being resubmitted as a supplemental study under Part 61 as it contains confidential information.

Rhodia Inc markets certain pesticide products, which contain this chemical as an active ingredient. The trade names and registration numbers of these products are:

Tolcide PS75	33677-3
Tolcide PS75LT	33677-7
Tolcide PS352C	33677-5
Tolcide PS355A	33677-6
Tolcide PS200	4564-15
Tolcide PS50A	4564-17

On March 9th, 2007 our European affiliate provided the US office with a draft copy of compositional information which had been prepared in support of this active ingredient under the European Biocidal Products Directive. This compositional information lists a new impurity in the technical grade active ingredient, Tolcide PS75, not currently listed in the Confidential Statement of Formula.

While this impurity is not considered to be of toxicological concern, we are reporting the new information in accordance with 40 CFR 159.179, as the upper range is above 0.1%. The discovery of the new impurity is the result of improved analysis and detection, as opposed to changes in composition. The report also includes further information regarding the equilibrium involving THPS.

An updated confidential statement of formula is included on page 10.

Should you have any questions, or require any further information, please call (609) 860-3913. Thank you.

Very truly yours,
RHODIA INC.

A handwritten signature in black ink, appearing to read "I. Bartlett".

Ian Bartlett Ph.D.
Manager, Regulatory Affairs and Product Stewardship

IMB/
Ref: 07-0008L.EPA.doc

Transmittal Document

Regulatory Action in Support of FIFRA 6(a)(2) Report

Phosphonium, tetrakis(hydroxymethyl)-, sulfate (2:1) (salt), CAS# 55566-30-8

1. Transmittal Date

May 4th, 2007

2. List of Submitted Studies

47124201 Tetrakis(hydroxymethyl) Phosphonium Sulfate (THPS): Discussion of Formation of Impurities: Supplemental Information to Report MRID# 42765303.